

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
EASTERN DIVISION**

**JOHN BARNHARDT, ET AL.  
PLAINTIFFS**

**AND**

**UNITED STATES OF AMERICA**

**PLAINTIFF-INTERVENOR**

**VS.**

**CIVIL ACTION NO. 4:65CV01300-HTW-LGI**

**MERIDIAN MUNICIPAL SEPARATE  
SCHOOL DISTRICT, ET AL.**

**DEFENDANTS**

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**AFFIDAVIT OF DR. AMY CARTER**

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Before me the undersigned Notary Public personally appeared Dr. Amy Carter, who, upon being duly sworn, deposes and says the following:

1. My name is Dr. Amy Carter. I am an adult resident citizen of the state of Mississippi. I am competent to execute this affidavit.
2. I am the Superintendent of the Meridian Public School District ("the District"). I have direct knowledge of the facts set out in this affidavit.
3. On May 26, 2022, I recommended to the Board of Trustees that the District consolidate Carver Middle School and reconfigure its middle school attendance zones. At the time, the District had three middle schools serving less than 1,000 students total at substantial cost to the taxpayers. Those three schools were Carver Middle School, Magnolia Middle School, and Northwest Middle School. I recommended the District consolidate its three middle schools into two and reassign Carver Middle School's students to Magnolia



Middle School and Northwest Middle School. The Board voted unanimously to approve my recommendation.

4. My recommendation to consolidate Carver Middle School's students was based on two factors: (1) Carver had the lowest student enrollment of the three middle schools and, (2) Carver had the highest number of teacher vacancies.

5. The District has had particular difficulty with teacher recruitment at Carver Middle School. For the 2022-2023 school year, Carver was projected to have vacancies in almost half of its certified teaching positions, despite the District's significant efforts to recruit teachers for those positions, including: (1) its recruitment team attended University Recruitment Fairs; (2) regularly updated job postings and social media blasts; (3) offered signing bonuses prior to the COVID-19 pandemic; (4) offered "finder's fees" to staff members who referred certified teachers to the District; (5) utilized William Carey University to encourage alternate route certifications; and (6) instituted a "Grow Your Own" program partnering with Jackson State University, Mississippi State University, the University of Mississippi, and William Carey University. Although these efforts earned the District praise from the Equity Assistance Center of the Intercultural Development Research Association, they did not accomplish the goal of filling vacant positions at Carver Middle School.

6. Following consolidation, the District has continued to provide transportation for former Carver students before and after school. The distances these students must travel have been minimally effected, one reason being that Meridian is not a large city. Bus routes from the old Carver zone to Northwest are shorter in some instances, and where the distance is longer it is less than two miles. Students reassigned from Carver to Magnolia

have a route increased by no more than 3.5 miles. The District also continues to provide transportation for extracurricular activities, after-school and summer remediation programs, and enrichment activities.

7. Consolidating the District's middle schools has allowed the District to accomplish several important educational objectives: (1) the District now has three counselors at both Magnolia Middle School and Northwest Middle School, offering students better access to emotional and social support; (2) all middle school students now have access to licensed, qualified teachers for the entire year; (3) former Carver students have access to courses at Magnolia and Northwest that were not available at Carver.

8. The District is providing additional supports to its middle schools to ensure a smooth transition. Each middle school will receive six days of professional development to support transitioning counselors. Teachers will receive professional development in the areas of English/Language Arts, math, science, and social studies using Title funds and School Improvement Program funds. This professional development will be provided by instructional specialists, academic coaches, and consultants. Tutors will be offered in core subject areas utilizing trained teacher assistants and retired teachers.

9. Throughout the summer of 2022, citizens had multiple opportunities to provide input and express concerns regarding facilities upgrades and changes. Members of the Carver Coalition were in attendance at each of these meetings. On June 8, 2022, I met with members of the Carver Coalition. On June 16, 2022, the school board president, board secretary, and district administration also met with the Coalition to hear and address concerns about the consolidation. On June 23, 2022, District administrators met with

faith-based community leaders to seek their input on facilities upgrades and changes.

The District also hosted a series of community meetings on June 30, July 28, and August 2, 2022, to hear citizens' concerns and ideas regarding facilities upgrades and changes.

Further affiant sayeth not.

Dated: August 10, 2022.

  
Dr. Amy Carter

STATE OF MISSISSIPPI  
COUNTY OF LAUDERDALE

On this 10<sup>th</sup> day of August, 2022, personally appeared before me, a notary public for the State of Mississippi, Dr. Amy Carter, whose name is subscribed to this affidavit, and acknowledged under oath its contents and that she personally executed same.

Seal:



  
NOTARY PUBLIC

My commission expires: April 15, 2024

EXHIBIT NO. \_\_\_\_\_  
CAUSE NO. \_\_\_\_\_  
WITNESS \_\_\_\_\_  
CLERK \_\_\_\_\_

AUG 11 2022

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
MEMPHIS, TENNESSEE

EXHIBIT NO. D-1  
CAUSE NO. 4:65CV130D  
WITNESS \_\_\_\_\_  
CLERK: JB

AUG 11 2022

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
FJ, REPORTER